

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE

THE FINANICAL OVERSIGHT AND
MANAGEMENT BOARD OF PUERTO RICO
as representative of
THE COMMONWEALTH OF PUERTO RICO,
et al

Debtor

PROMESA

Title III

No. 17BK3283-LTS

**REPLY TO DEBTOR'S THREE HUNDRED THIRTY-SIXTH OMNIBUS OBJECTION
(SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO
TO CLAIMS FOR WHICH THE COMMONWEALTH IS NOT LIABLE-
BARRERAS INC'S PROOF OF CLAIM 21597**

TO THE HONORABLE COURT:

COME NOW, **Barreras, Inc.**, creditor in the above captioned case, through the undersigned attorney, and very respectfully state and pray as follows:

1. On June 18, 2021, debtor filed the "Three hundred and thirty-six omnibus objection (substantive) of the commonwealth of Puerto Rico to claims for which the Commonwealth is not liable. (**Docket 17101**).

2. On said objection Debtor includes the following as reasons for the objection to claim 21597 filed by creditor Barreras Inc: "[p]er the books and records do the Administracion Vocacional Rehabilitation, there are no amounts due for the liabilities asserted; invoices were paid in full".

3. The objection did not include any evidence or further information other than what is stated above.

4. Proof of claim 21597 was filed for \$108,800.00. This amount pertains to a rent increase difference incurred from January 1, 2014. On said date, the rent increased from

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\$46,241.00 to \$49,641.00 per the contract between the parties signed on July 1, 2011. Specifically, Addendum "A" section 9.1 (b). (**See Exhibit 1**).

5. From January 1, 2014, Debtor continued to make payments but not for the newly increased amount due. They made partial monthly payments for the original sum of \$46,241.00 ignoring the rent increase provided for in the contract and invoiced by creditor. This caused the accrual \$108,800.00 in arrears which were correctly claimed by creditor on proof of claim 21597. (**See Exhibit 2**).

6. Thus, creditor hereby request that this Honorable Court enter an order denying Debtor's objection to claim 21597 and allow the same as filed.

WHEREFORE, it is respectfully requested that this Honorable Court enter an order denying Debtor's objection to claim 21597 and allow the same as filed.

CERTIFICATE OF SERVICE: I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to all creditors and other parties in interest which have filed a notice of appearance in the captioned case.

In Guaynabo, Puerto Rico, this 19th day of July 2021.



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